

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)
)
v.)
)
PAUL J. MANAFORT, JR.,)
)
Defendant.)
)
Crim. No. 17-201-01 (ABJ)

**DEFENDANT PAUL J. MANAFORT, JR.'S MOTION FOR LEAVE
TO FILE UNDER SEAL EXHIBITS TO MOTION TO SUPPRESS**

Defendant Paul J. Manafort, Jr., by and through counsel, hereby moves for leave to file under seal three exhibits to the defendant's Motion to Suppress ("Motion") pursuant to the Local Rules. LCrR 49(f)(6). The exhibits in question are the special agent's affidavit concerning the search of a certain storage unit in Alexandria, Virginia, the search and return, and the lease agreement of the subject storage unit. Based on the Court's earlier instructions concerning the public's access to judicial records, but also paying deference to the protective order previously entered in this case (Dkt. # 46), a redacted version of the these exhibits which include information only with respect to those legal issues identified in the defendant's Motion to Suppress will be submitted on the public docket. Information including the address of the searched premises and the special agent's identity is also redacted.

As the Court is aware, the parties are currently litigating the defendant's pending motion to compel the Special Counsel to turn over unredacted search and seizure warrant affidavits relating to Mr. Manafort. (Dkt. ## 242, 253). For purposes of the Motion to

Suppress, however, the defendant hereby provides the Court with the current exhibits in his possession, which include redactions made by the Special Counsel.

WHEREFORE, the defendant moves for leave to file under seal these three exhibits to his Motion to Suppress.

Dated: April 6, 2018

Respectfully submitted,

/s/

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